

STATEMENT OF KIQS, INC.

KIQS, INC., a California Corporation, hereby files this statement in the proposed rulemaking in which Pacific Spanish Network seeks to modify the table of allotments by deleting channel 288A in Willows and allotting 288B1 to Dunnigan, Ca., with a simaltenious modification of the license of the FM station presently assigned to Willows.


KIQS, INC. is presently licensee of KIQS (AM) in Willows. After the FM station is moved to Dunnigan, we intend to continue operating KIQS (AM) and to provide a program service to serve the needs of Willows.

KIQS, INC. is presently conducting an engineering study to identify a new FM channel that can be assigned to willows. Upon identifying such a channel, we intend to ask the FCC to allocate it to Willows. Upon such allocation, we intend to apply for a construction permit for the channel.

Once the FM station leaves for Dunnigan, KIQS (AM) will continue to operate on the same basis as we did before KIQS (FM) was granted to Willows.

During a survey, just being completed, we show a 70% listernship. Using the same format, we feel KIQS (AM) will be able to continue with the services we have given the community since 1972.

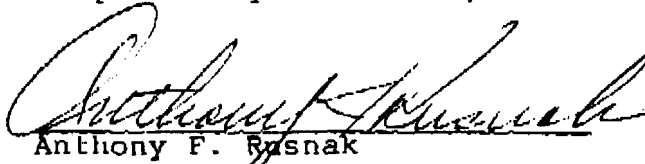
Respectfully submitted,
KIQS, INC.


Anthony F. Rusnak, President
118 West Sycamore Street
Willows, Ca. 95988

CERTIFICATION

I, Anthony F. Rusnak, certify that the information contained in the foregoing comments is true and accurate to the best of my knowledge.

Respectfully submitted,


Anthony F. Rusnak
KIQS, INC.
118 West Sycamore Street
Willows, Ca. 95988

Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing

TEST SITE 54 DBU CONTOUR

Willows

Glenn

Butte City

GLENN COUNTY

Stonyford

Fouts Springs

Lodoga

Sites

Maxwell

Princeton

Colusa

West Butte

Mendocino

Sycamore

Grimes

Arbuckle

Colusa City

TEST SITE 70 DBU CONTOUR

East Gridley

Gridley

Hercules

Live Oak

Sutter

Tierra Buena

South Yuba

Alicia

Oswald

Olivehurst

Arboga

DUNNIGAN REFERENCE SITE

Everglade

Kirkville

Robbins

East Nicolaus

Nicolaus

Dunnigan

Rumsey

CENTER OF MAP:

N LAT 39 13' 00.00"

W LON 122 05' 00.00"

Scale 1: 411,840

MAP 6

FULLY SPACED AREA TO LOCATE

CHANNEL 288B1

WILLOWS-DUNNIGAN, CALIFORNIA



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

FULLY SPACED AREA TO LOCATE

CHANNEL 288B1 TEST SITE

Willits

Clearlake Oaks

Chamisa Gap

Clearlake Highlands

Lower Lake

122 00 00

122 30 00

123 00 00

123 30 00

124 00 00

124 30 00

125 00 00

125 30 00

JUN-18-1994

08:06

LAWRENCE L. MORTON, P.E.

805 733 4793

P.02/05

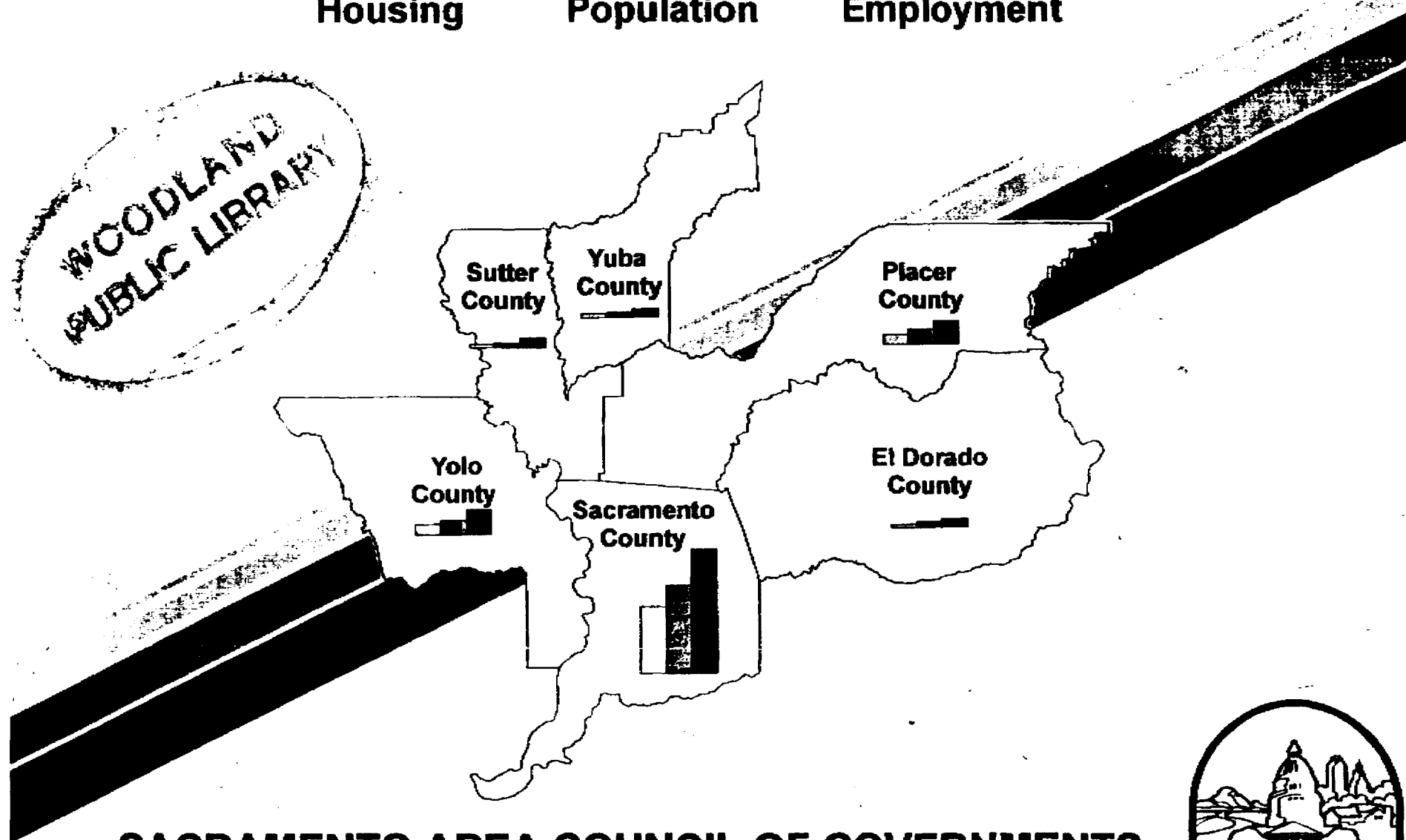
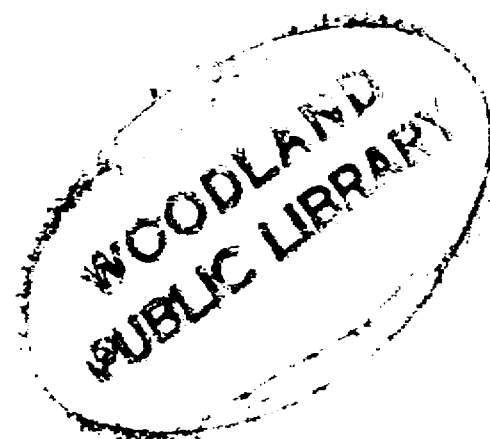


PROJECTIONS 1992 - 2015

Housing

Population

Employment



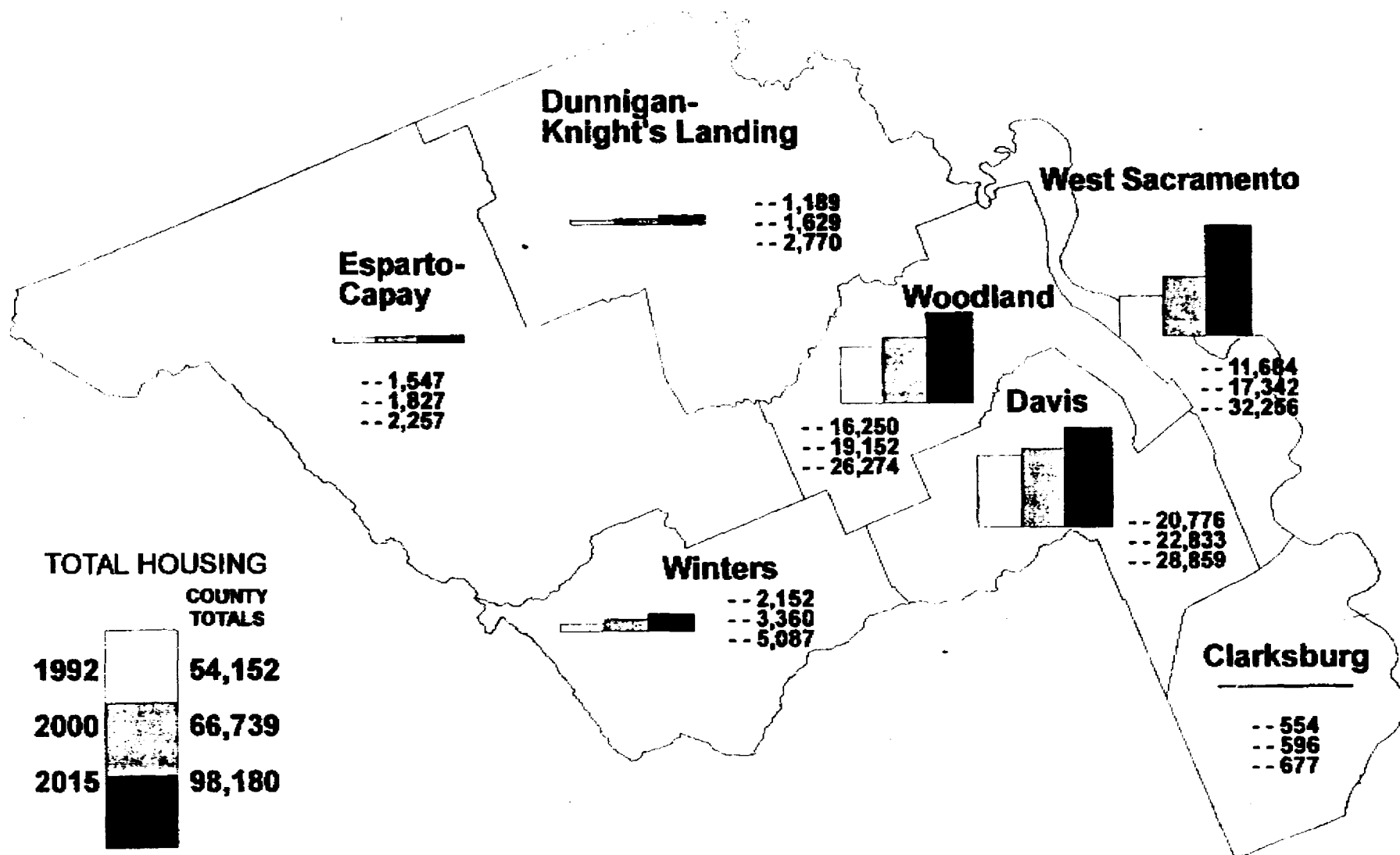
**SACRAMENTO AREA COUNCIL OF GOVERNMENTS
REGIONAL DATA CENTER**



YOLO COUNTY

HOUSING PROJECTIONS

BY REGIONAL ANALYSIS DISTRICTS



YOLO COUNTY HIGHLIGHTS

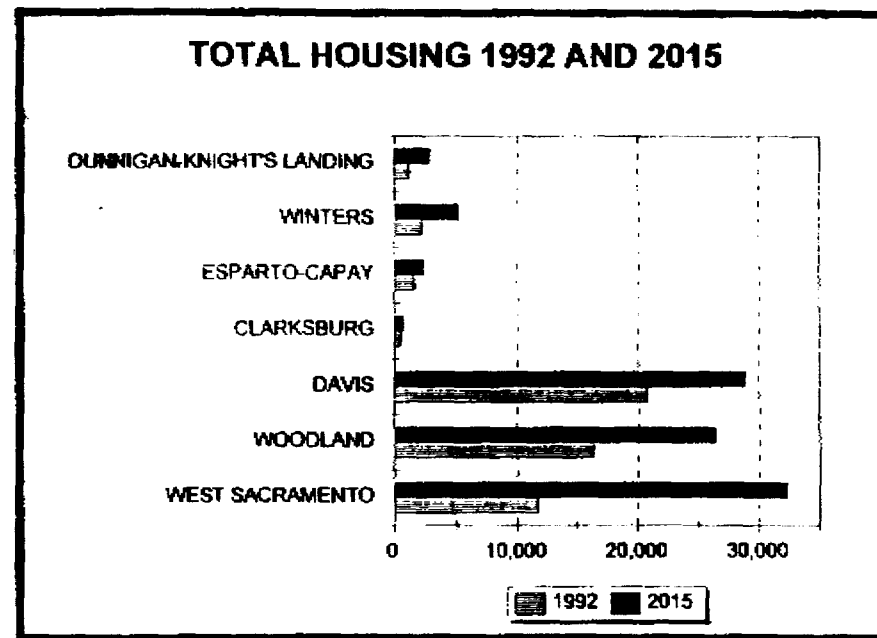
Yolo County is divided into seven Regional Analysis Districts. In 1992, Yolo County had 54,152 housing units, 149,200 people and 63,921 jobs. Between 1992 and 2015, 44,028 new housing units are forecasted with an increase of 81.30%. Population is projected to increase 114,519 people with a 76.76% increase. Employment will more than double during the projected period with 83,456 jobs added and a 130.56% increase. In 2015, Yolo County will have 98,180 housing units, a population of 263,719 and 147,377 jobs.

- **West Sacramento** is projected to have the largest increase in all three categories in Yolo County. West Sacramento housing will increase more than two½ times with 20,572 units added. Population is also expected to grow two½ times with the addition of 48,097 people. Employment is projected to increase more than three times over the 1992 figure of 20,166 with 41,175 jobs added. In 2015, West Sacramento will have the highest total housing with 32,256 units and the highest number of jobs with 61,341. It will have the second highest population total with 78,904 people forecasted.
- **Woodland** has the second highest total increase forecasted for all three categories. However, even with the addition of 10,024 units and 28,590 people Woodland will drop from the second highest in housing and population to third highest. Woodland will become the second largest employment center in 2015 with the addition of 24,024 jobs. In 2015, Woodland will have 26,274 units, a population of 73,826 and 40,511 jobs.
- **Davis**, in 1992, had the most housing units in Yolo County. With the addition of 8,083 units, only the third highest increase in the county, Davis will become the second largest RAD with 28,859 units. Davis will continue to have the largest population in the county. In 2015, it is projected to have 80,144 people. The increase of 22,320 people is the third largest in the county. With the third largest employment increase Davis will drop from the largest employment center to third largest. In 1992, Davis had 24,779 jobs. In 2015, it is forecasted to have 37,585 jobs.
- **Clarksburg**, in 2015, in terms of total numbers will be the smallest RAD in Yolo County. It is projected to have the smallest total increase and percent increase. In 1992 the housing unit count was 554 and is projected to reach 677 units in 2015. Population will increase from 1,505 to 1,740. Employment is

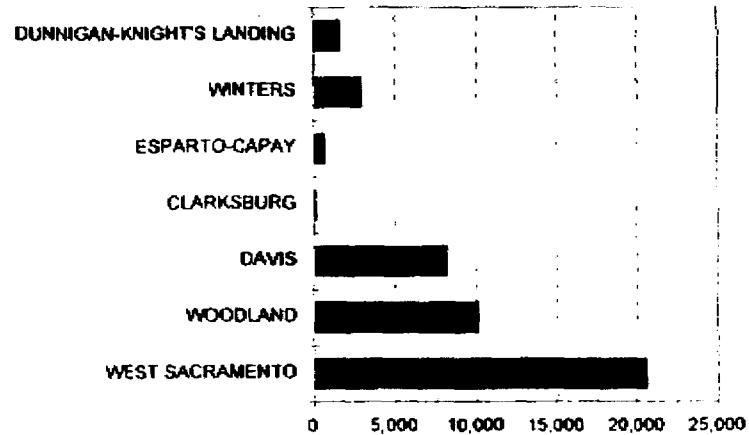
not expected to change. In 1992 employment is estimated to be 690 jobs and will remain at 690 in 2015.

- **Dunnigan - Knight's Landing** will experience the third smallest increase in housing and population. However, both housing and population will more than double during the forecasted period. With the addition of 1,581 units, Dunnigan - Knight's Landing will increase 132.97%. Population will increase by 4,322 an increase of 133.31%. More significant is the 977.30% increase in employment. In 1992 Dunnigan - Knight's Landing had 282 jobs. In 2015, 3,038 jobs are forecasted. This is an addition of 2,756 jobs.

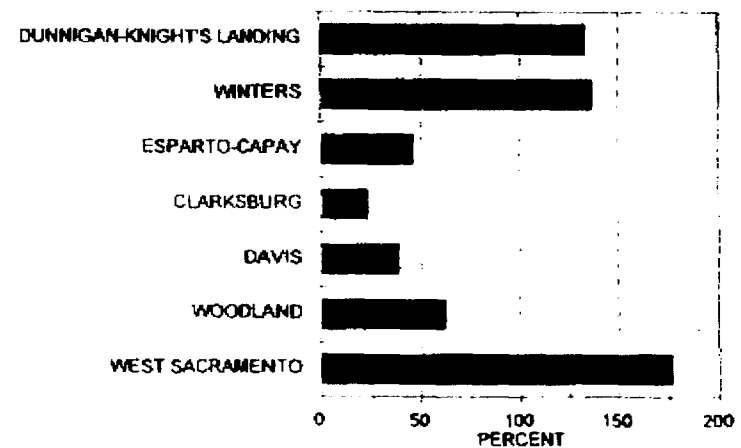
YOLO COUNTY HOUSING



TOTAL INCREASE 1992 - 2015



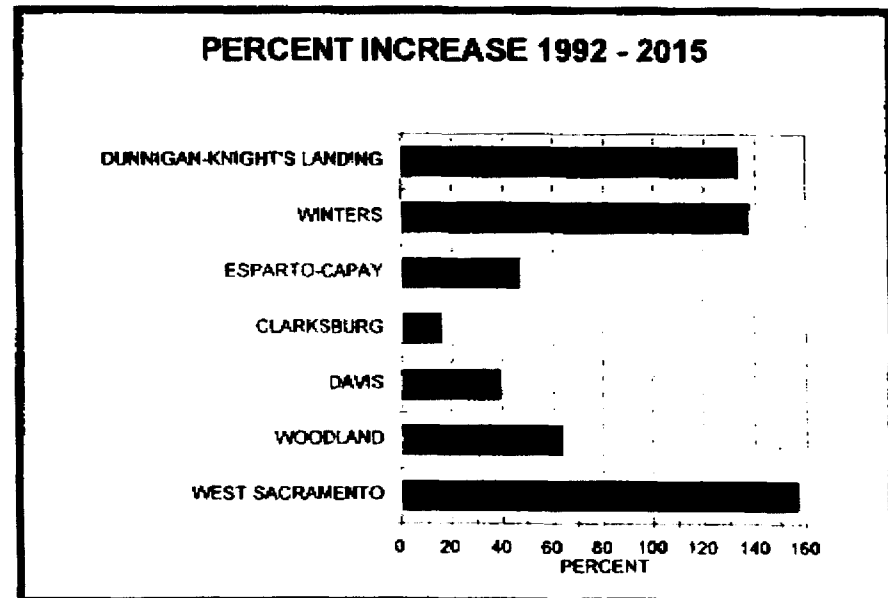
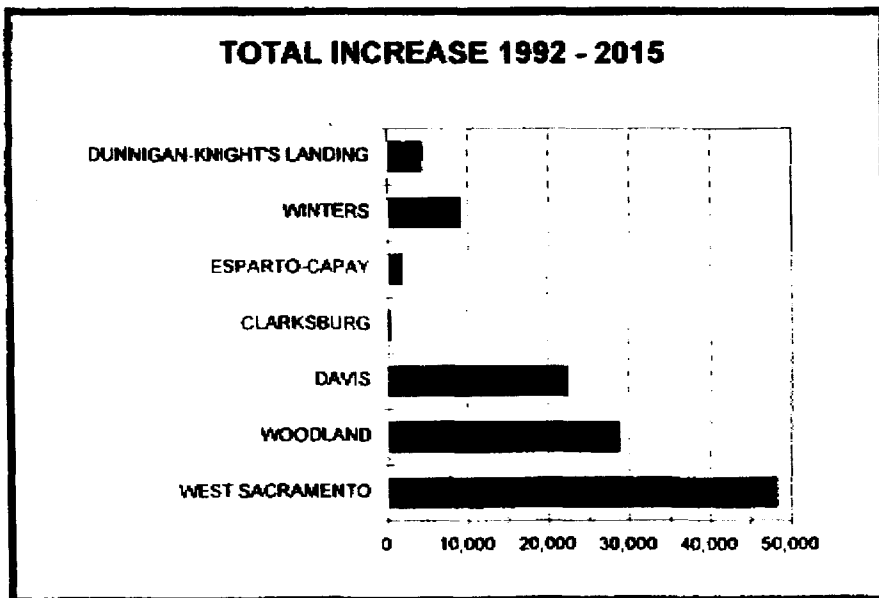
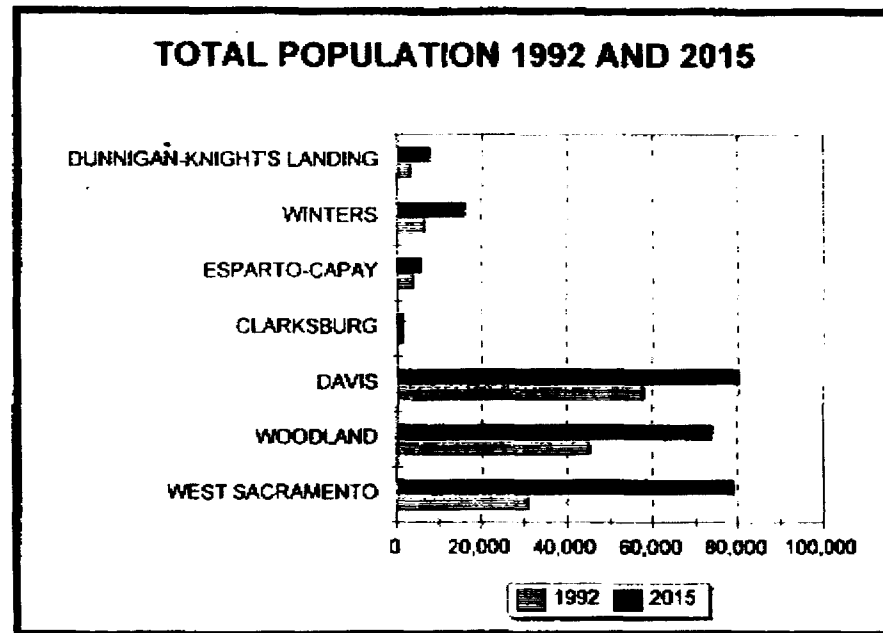
PERCENT INCREASE 1992 - 2015



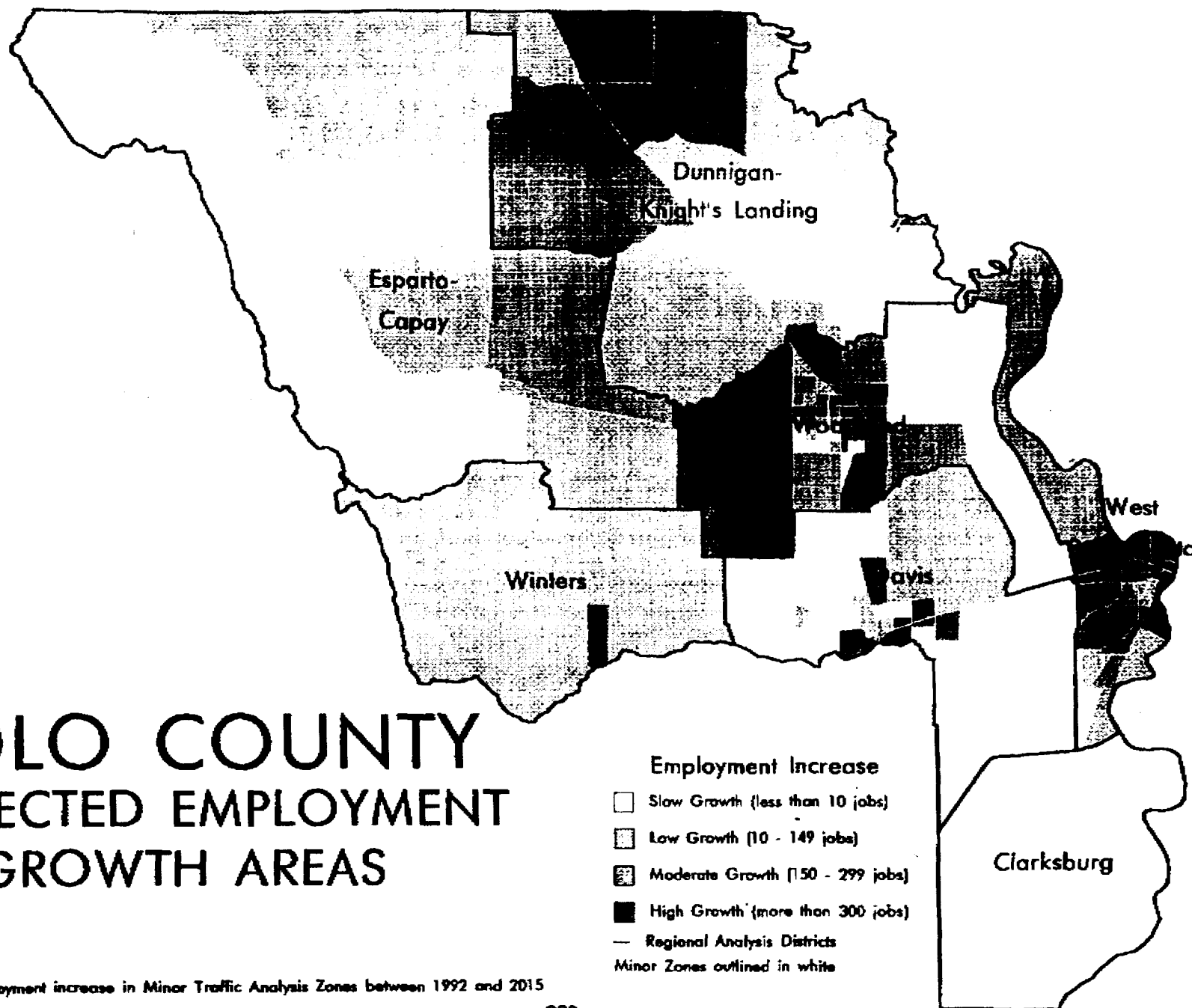
YOLO COUNTY POPULATION

REGIONAL ANALYSIS DISTRICT	BASE YEAR 1992	1995	2000	2005	2010	TARGET YEAR 2015	TOTAL INCREASE 1992-2015	PERCENT INCREASE 1992 - 2015
WEST SACRAMENTO	30,807	35,973	43,916	56,405	71,987	78,904	48,097	156.12%
WOODLAND	48,238	48,724	54,081	59,089	65,328	73,826	25,590	63.20%
DAVIS	57,824	60,463	64,522	68,318	73,044	80,144	22,320	38.60%
CLARKSBURG	1,885	1,535	1,587	1,636	1,694	1,746	238	15.61%
ESPARTO - CAPAY	3,959	4,264	4,737	5,178	5,726	5,800	1,841	46.50%
WINTERS	6,627	8,114	10,403	12,539	15,207	15,741	9,114	137.53%
DUNNIGAN - KNIGHT'S LANDING	3,242	3,735	4,490	5,197	6,082	7,564	4,322	133.31%

YOLO COUNTY POPULATION



YOLO COUNTY PROJECTED EMPLOYMENT GROWTH AREAS



Based on employment increase in Minor Traffic Analysis Zones between 1992 and 2015

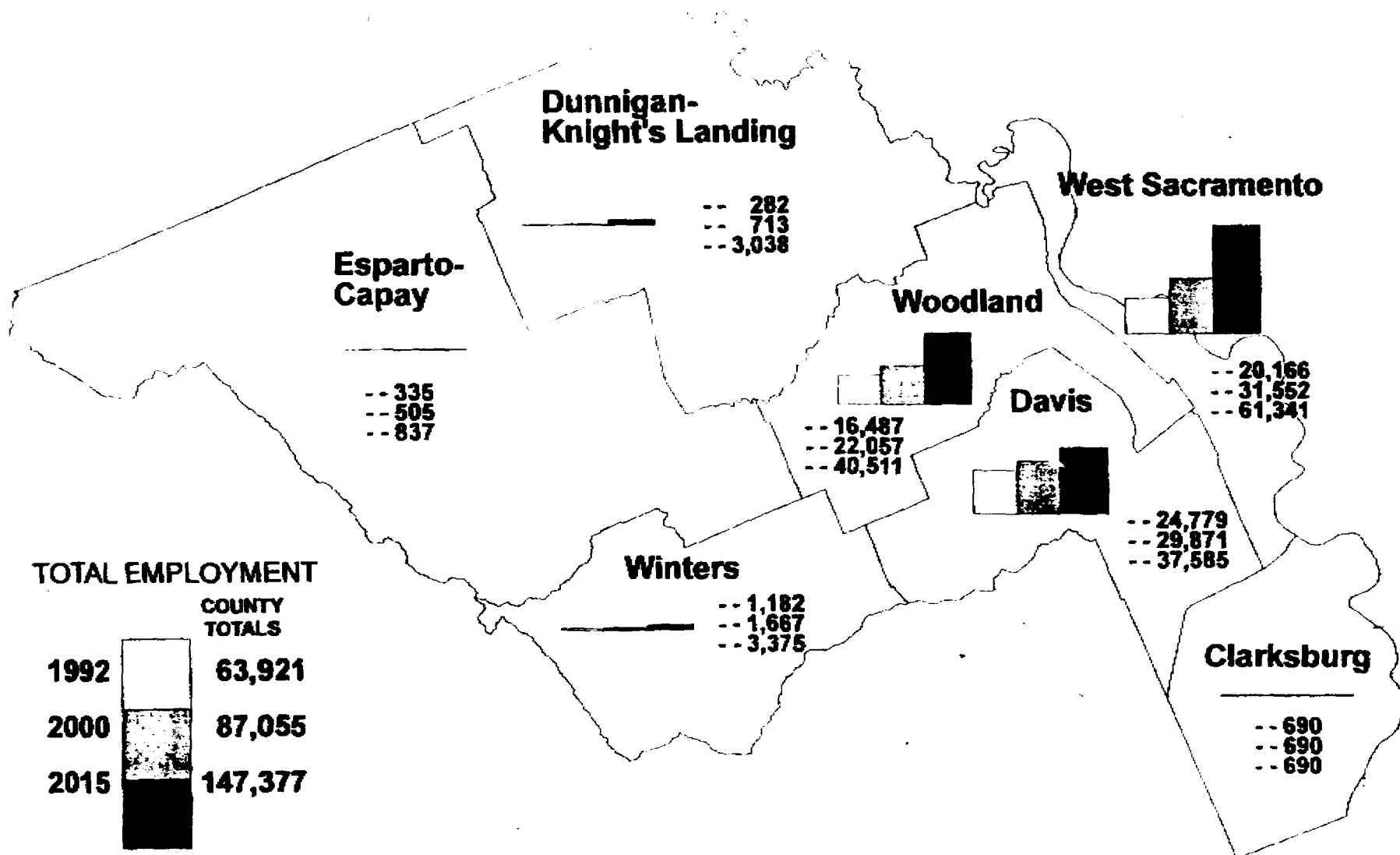
YOLO COUNTY EMPLOYMENT

REGIONAL ANALYSIS DISTRICT	BASE YEAR 1992	1995	2000	2005	2010	TARGET YEAR 2015	TOTAL INCREASE 1992-2015	PERCENT INCREASE 1992 - 2015
WEST SACRAMENTO	20,166	24,653	31,552	40,064	50,692	61,341	41,175	204.18%
WOODLAND	15,487	18,685	22,057	26,313	31,628	40,511	24,024	145.71%
DAVIS	24,779	26,786	29,871	33,301	37,585	37,585	12,806	51.68%
CLARKSBURG	690	690	690	690	690	690	0	0.00%
ESPARTO - CAPAY	335	403	505	601	722	837	502	149.85%
WINTERS	1,182	1,374	1,667	1,941	2,282	3,375	2,193	185.53%
DUNNIGAN - KNIGHT'S LANDING	282	453	713	955	1,256	3,038	2,756	977.30%

YOLO COUNTY

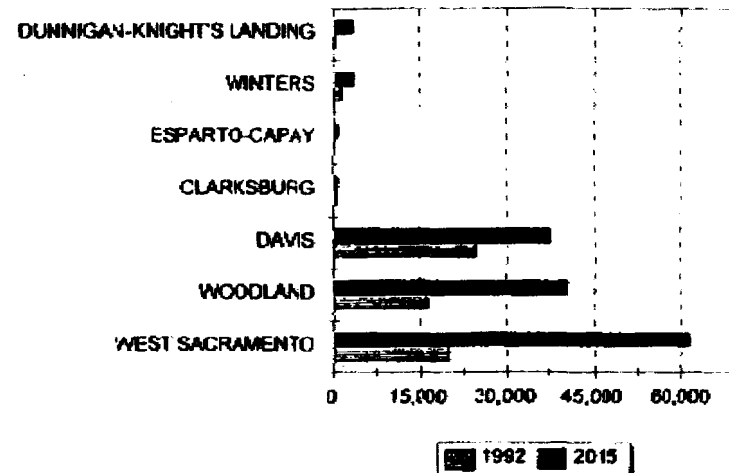
EMPLOYMENT PROJECTIONS

BY REGIONAL ANALYSIS DISTRICTS

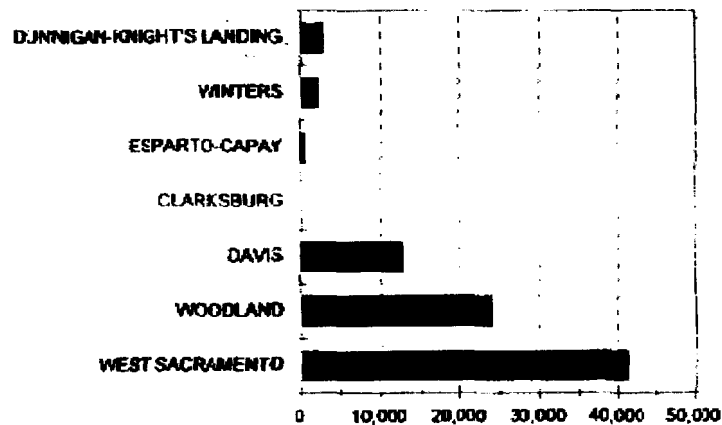


YOLO COUNTY EMPLOYMENT

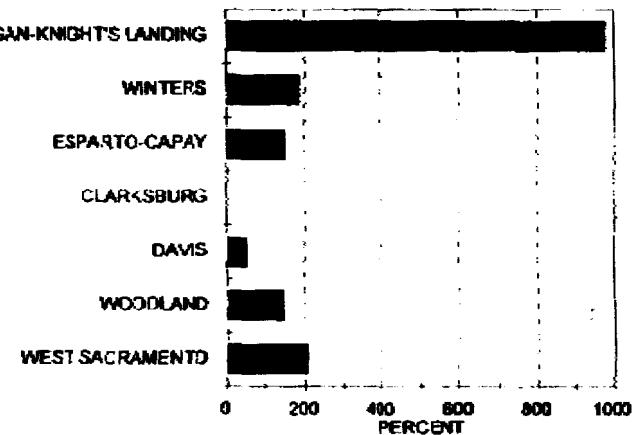
TOTAL EMPLOYMENT 1992 AND 2015



TOTAL INCREASE 1992 - 2015



PERCENT INCREASE 1992 - 2015





323 First Street
Suite One
Woodland, CA 95695

916.666.3943
Davis 916.756.9010
Fax 916.666.2216

June 16, 1994

Mr. Robert Thompson
Pepper & Corazzini
200 Montgomery Building
1776 K Street N.W.
Washington, DC 20006

Via Fax: (202) 296-5572

RE: Dunnigan Community

Dear Mr. Thompson:

I am a fifth generation and life-long resident of Yolo County. Dunnigan has always been considered a community by myself and my relatives. There are many long time families living in Dunnigan that we have stayed in touch with over the years. They would always keep us up to date on what was happening in Dunnigan when we saw each other.

Currently, we represent a commercial development project located in Dunnigan. We are planning an industrial park on 62 acres and a highway commercial center on 20 acres. The project should provide 150 to 250 jobs upon completion. We anticipate build-out over the next 4 years.

In addition we are working with two ag-industrial companies looking to locate near Dunnigan that will employ 75 to 200 people.

Our company would be supportive of a radio frequency that would serve the Dunnigan community.

If you have any questions I can be reached at (916) 666-3943.

Sincerely,

Ken Reiff



Wayne Stoops & Associates

June 15, 1994

Attention of the Federal Communication Commission

C/O Robert Thompson
Pepper & Corazzini
200 Montgomery Bldg.
1776 K St., N.W.
Washington, D.C. 20006

Re: Dunnigan, CA. (Yolo County)

Sir or Madam:

We are real estate developers with a 50-acre commercial project now in process in Dunnigan, CA. This community is one and one-half miles north of the intersection of I-5 and I-505. This is the last intersection of two interstate highways in California to be developed.

CalTrans, the highway department of California, reports that 4,000 people now stop daily in Dunnigan. CalTrans measures this as it maintains two rest stops on I-5 in Dunnigan.

The California Land Use Institute, in a market study managed by the Yolo County Community Development Agency, reports that there is a cumulative population of 1,214,100 in a 50-mile radius from Dunnigan, and 1,847,000 in a 75-mile radius.

CalTrans 1993 traffic report showed the average daily traffic at a major street (and I-5) in Dunnigan was 24,800. The average daily traffic in the peak month was 32,000. CalTrans anticipates Dunnigan traffic will increase by 70% by the year 2,000.

There are major industrial and residential projects also in process in Dunnigan.

Sincerely,

Wayne Stoops

Wayne Stoops

cc: Brett E. Miller

SWORN STATEMENT OF BRETT E. MILLER

The undersigned hereby files this statement in response to the Comments filed in the Proposed Rule Making in which KIQS, Inc. seeks to modify the Table of Allotments by the substitution of Channel 288B1 for Channel 288A at Willows, the reallocation of Channel 288B1 from willows to dunnigan, CA, and modification of the license for Station KIQS-FM.

1. In July, 1993, the undersigned Consultant/Broker was retained by KIQS, Inc., in an agency capacity to consult in the upgrading of and perhaps to sell KIQS-AM and/or KIQS-FM.

2. At the time that I began to analyze the two Willows stations, I noted that KIQS-FM was operating at less than optimal capability. It was possible for KIQS-FM to operate at 6,000 watts ERP at 100 meters, but in fact the station was operating at only 5,400 watts ERP at 71 meters.

3. Certain engineering studies were conducted and initially it was thought that there were two options available to KIQS, Inc., and/or any successor owner of the FM station, if it were sold:

(a) Increase the power and/or antenna height at the authorized site, or

(b) Move the transmitting antenna/tower approximately 8 miles closer to the community of Chico, along with an increase in power and/or antenna height, thereby increasing coverage.

4. Further studies uncovered a situation which presented a unique and highly desirable third option. Radio station KQBR-FM, licensed to Davis, California, had been operated (as near as I could determine) as a grandfathered 3,000 watt Class A facility on 105.5 mhz with no possibility of increasing its class of service due to the presence of co-channel KIQS-FM at Willows, California, which had no possibility of upgrading its class of service--due to the presence of KQBR in Davis as well as KCFM-FM, licensed to Shingletown, California, to the north of Willows.

5. KQBR-FM recently changed frequency from 105.5 mhz to 104.3 mhz with (as near as I could determine) an increase in power. This, then allowed KIQS-FM its best option: with the interfering contour of KQBR-FM removed, KIQS-FM would be able to upgrade to a higher class of service, going from a 5,400 watt Class A to a 25,000 watt Class B1--provided it move south, away from first adjacent channel KCFM-FM.

6. The decision was made to proceed with an upgrade in class of service of KIQS-FM. As an interim improvement, KIQS-FM made a simple upgrade from 5,400 watts at its current site to 6,000 watts. This still left the station underdeveloped due to a short tower

height. Subsequently, the decision was made to maximize the station's class of service. To do this, KIQS-FM had to move away from KCFM-FM and into the area to locate which was created by the move of KQBR-FM. This fully spaced area to locate was south of KIQS-FM's current area to locate.

7. At that time, and prior to a subsequent sale of the FM station to Pacific Spanish network, KIQS, Inc., decided that it made more sense to have two stations with signals separated from each as opposed to overlapping each other, basically covering the same territory.

8. The beneficial outcome of these station reallocations became evident in quick order:

(a) KQBR-FM was able to maximize its class of service by moving from 105.5 mhz to 104.3 mhz,

(b) KIQS-FM would be able to move into a new fully spaced area to locate and maximize its class of service on-frequency with an increase in power to 25,000 watts,

(c) KCFM-FM would be able to increase its class of service on frequency at 105.3 mhz, from its current site, and upgrade from a Class C2 to a Class C1.

9. KIQS, Inc., then determined that the town of Dunnigan would be the best city of license which could be served from the fully spaced area to locate, which would provide minimal overlap between KIQS-AM and KIQS-FM, and which was far enough away from first adjacent KCFM-FM to allow for maximum power. KIQS, Inc., proceeded to file the Petition for Rule Making to which Pacific Spanish Network has succeeded.

10. Located on Interstate 5, is the town of Dunnigan, which I have visited several times. Dunnigan has a history of long-standing; clearly defined boundaries; a Town Hall; a U.S. Post Office; a fire station which provides first-alert, medical service; a water district; churches, one of which is about to celebrate its centennial; a golf course; several businesses; a local civic group which works within the community; a Community Services District, appointed by the Yolo County Board of Supervisors which coordinates public utilities with County Services; and a Citizens' Advisory Committee, appointed by the Yolo County Board of Supervisors, which is responsible for the development of the Dunnigan Master Plan.

11. I was informed by the Yolo County Planning Department that Dunnigan's population is expected to grow to approximately 4,000. There are at least three developers with plans before the Planning Commission at this time. The Elkins Company is planning an 83-acre commercial development, Wayne Stoops and Associates is planning a

53-acre commercial development, and Lakemont Development, Inc., is planning a 700-home residential development.

12. Mr. Mike Luken, Associate Planner with the Yolo County Planning Department has informed me that Dunnigan's Master Plan could be adopted in approximately four to five months.

I affirm under penalty of perjury that the foregoing is true and correct. Executed on June 20, 1994.

Brett E. Miller



11806 Blossomwood Ct.

Moorpark, CA 93021

(805) 523-7312

CERTIFICATE OF SERVICE

I, Karen D. Anderson, do certify that a copy of the foregoing "Reply Comments of Petitioner" was served by prepaid, First Class U.S. Mail on this 21st day of June, 1994, on the following:

Mr. Michael Birdsill
Box 1921
Chico, CA 95927

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Karen D. Anderson